REMARKS

The Abstract and Claims 8, 12, and 16 have been amended. No new matter has been introduced with these amendments, all of which are supported in the specification as originally filed. Claims 1 - 13 and 16 - 24 remain in the application.

I.   Rejection under 35 U.S.C. §102(b)

Paragraph 7 of the Office Action dated March 18, 2005 (hereinafter, "the Office Action") states that Claims 1 - 8, 10, 12, 16 - 21, and 23 - 24 are rejected under 35 U.S.C. §102(b) as being anticipated by Richards et al., U. S. Patent 5,179,654. This rejection is respectfully traversed.

The rejection of Applicant's independent Claims 1, 10, 12, and 16 will now be discussed.

The Office Action cites col. 1, line 60 - col. 4, lines 48 of Richards, as well as col. 3, lines 17 - 28; col. 9, lines 1 - 10; Fig. 9; and Fig. 10 of Richards as teaching the limitations of Applicant's Claim 1. However, the Office Action fails to make out a *prima facie* case of anticipation as to Claim 1. Instead, the Office Action states that Richards teaches "a system of keys" (p. 3, line 10 of the Office Action) and "a group of keys are used" (p. 3, line 19 and para. 26, line 3 of the Office Action).

Applicant's claims do not simply specify "a system of keys" or "a group of keys". Applicant's claims specify keys with explicit limitations: some of the keys are specified as

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having particular relationships to other keys (for example, in Claim 1, the "first key" and "second key" are provided as a "key pair"; the "first keys" point to "name keys"; and the "second keys" point to "string keys"), and others of the keys are specified as having relationships with certain values (e.g., in Claim 1, the "name key" has an "associated name value", and these are provided as a "name pair"; the "string key" has an "associated string value", and these are provided as a "string pair"). Furthermore, Applicant's claims specify relationships between the values. In Claim 1, for example, a "string value [is] associated with a selected name value" (Claim 1, line 11, emphasis added), and the string value is accessed "by using a particular one of the key pairs", that particular key pair being the key pair where "the first key ... points to the name key with which the selected name value is associated" (Claim 1, lines 12 - 13) and where "the second key ... points to the string key with which the string value to be accessed is associated" (Claim 1, lines 13 - 14).

Referring to additional limitations of Claim 1, this claim specifies "... a plurality of name pairs ..." (lines 3 - 4); "... a plurality of string pairs ..." (lines 5 - 6); and "... a plurality of key pairs, each of the key pairs comprising a first key and a second key, each of the first keys [from the *key* pairs] pointing to one of the name keys [in the *name* pairs] and each of the second keys [from the *key* pairs] pointing to one of the string keys [in the *string* pairs] ..." (lines 7 - 10, emphasis added).

See, for example, Fig. 2, where the "plurality of key pairs" (Claim 1, line 7) is illustrated at reference number 210. From the sample key pair shown at 210, the "first key" (Claim 1, line

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7) at 211 is shown as "K1*". This "first key" points to "one of the name keys" (Claim 1, line 8), identified in the example as "K1". This "name key" K1 is from a "name pair" (Claim 1, line 3) that further comprises "an associated name value" (Claim 1, lines 3 - 4). In the example, the "associated name value" is shown as "V1".

The sample key pair shown at 210 also contains a "second key" (Claim 1, line 8) at 212, shown in the example as "K2*". This "second key" points to "one of the string keys" (Claim 1, lines 8 - 9), identified in the example as "K2". This "string key" K2 is from a "string pair" (Claim 1, line 5) that further comprises "an associated string value" (Claim 1, lines 5 - 6), which in the example is shown as "V2".

Using Applicant's novel key pair structure enables, as specified in Claim 1, lines 11 - 14, "accessing the string value [e.g., "V2"] associated with a selected name value [e.g., "V1"] by using a particular one of the key pairs [i.e., the (*K1, *K2) pair, in this example], wherein the first key ["*K1"] in the particular one of the key pairs points to the name key ["K1"] with which the selected name value ["V1"] is associated and the second key ["*K2"] in the particular one of the key pairs points to the string key ["K2"] with which the string value ["V2"] to be accessed is associated".

The Office Action does not identify which elements of Richards are relied upon for these details of Applicant's Claim 1, and instead, specifies how Richards uses his system/group of keys.

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A further limitation of Claim 1, which has not been discussed in the Office Action, is that "each of the first keys point[s] to <u>one</u> of the name keys" and "each of the second keys point[s] to <u>one</u> of the string keys" (Claim 1, lines 8 - 9, emphasis added). The Office Action has not identified (and Applicant is unable to find) any entity taught by Richards that can be aligned to the detailed limitations of Applicant's "first keys" and "second keys".

For example, Richards teaches that his system state variables (where a "system state [is] defined by the system variables", col. 3, lines 24 - 25), "do[] not necessarily correspond to a <u>unique</u> unit of help text. Some system states may <u>share</u> common help text so that addressing the key table [using such system states] will produce the <u>same</u> key." (col. 3, lines 23 - 28, emphasis added). Thus, Richards' system state variables <u>do not meet the limitations</u> specified in Claim 1 for Applicant's "first keys" or "second keys".

The Office Action refers to Richards' "help text branch table" and its "destination key" (para. 8, final 5 lines; para. 26, final 6 lines). Richards teaches that his user may select a "selectable word" from the displayed help text. However, Richards further teaches that "Selection of such a wor[d] ... causes the <u>key to the current help text</u> to be applied <u>with the selected word</u> to a Help Text Branch table." (col. 10, lines 39 - 41). Thus, the Help Text Branch table is indexed by a <u>combination</u> of what was selected by the user ("the selected word") <u>and</u> "the key to the current help text". Accordingly, these entities <u>also fail to meet the limitations</u> of Applicant's Claim 1.

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Applicant therefore respectfully submits that the Office Action has failed to make out a *prima facie* case of anticipation as to Claim 1.

Independent Claim 10 is similar to independent Claim 1, using (in Claim 10) the terms "topic pairs" and "text pairs" instead of Claim 1's "name pairs" and "string pairs", respectively. Claim 10 further specifies that the topic pairs and text pairs are in the same data structure. See lines 3 - 5, referring to "a data structure" comprising "a first array containing topic pairs" and "a second array containing text pairs".

The Office Action provides no discussion of these details of Applicant's Claim 10, and in particular, fails to identify any data structure that comprises a "first array" and a "second array", where the first array contains topic pairs (as such are further defined in Claim 10) and the second array contains text pairs (as such are further defined in Claim 10).

Independent Claims 12 and 16 specify limitations analogous to those of Claim 10. Accordingly, as demonstrated above, Applicant respectfully submits that the Office Action fails to make out a *prima facie* case of anticipation as to Applicant's independent claims. Without more, these claims are deemed patentable. See *In re Oetiker*, 24 USPQ 2d 1443, 1444 (Fed. Cir. 1992), which stated

> If the examination at the initial stage does not produce a prima facie case of unpatentability, then without more the applicant is entitled to grant of the patent.

Dependent Claims 2 - 8 and 16 - 21 are therefore deemed patentable over the reference as well,

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and the Examiner is respectfully requested to withdraw the §102 rejection.

II.   Rejection Under 35 U.S.C. §103(a)

Paragraph 22 of the Office Action states that Claims 9, 11, 13, and 22 are rejected under 35 U.S.C. §103(a) as being unpatentable over Richards in view of Java 2 Platform SE v1.3.1: Class ListResourceBundle. This rejection is respectfully traversed.

As discussed above, Applicant respectfully submits that his independent Claims 1, 10, 12, and 16 are patentable over Richards. Dependent Claims 9, 11, 13, and 22 are therefore deemed patentable over the reference by virtue of (at least) the patentability of the independent claims from which they depend. The Examiner is therefore respectfully requested to withdraw the §103 rejection.

III.   Comments on Response to Arguments

Paragraph 25 of the Office Action states "The applicants' argue that Richards teaches key pairs.". Applicant respectfully notes that this is an incorrect statement of the argument provided in the previously-submitted response (dated November 22, 2004, hereinafter "the previously-submitted response"). In the previously-submitted response, Applicant stated that Richards _fails to teach_ key pairs. See p. 14, lines 6 - 7 of the previously-submitted response.

Paragraphs 27 and 28 of the Office Action state that, in Applicant's previously-submitted response, Applicant relied on features "not recited in the rejected claim(s)", citing text from the

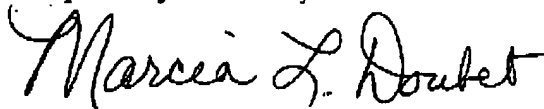Serial No. 10/052,579   -15-   RSW920010149US1

paragraph on p. 14, lines 6 - 11 of Applicant's previously-submitted response. Applicant apologizes for any confusion caused by this paragraph, which was intended as a summary of the paragraph that begins at the bottom of p. 13 and carries over to the top of p. 14. In this carry-over paragraph, Applicant relied on particular terms from his claim language, where those terms differ between Claim 1 and Claims 10, 12, and 16. The summary text in the cited paragraph from p. 14, lines 6 - 11 therefore did not repeat the particular, differing terms. The parenthetical "(i.e., "name pairs", in Claim 1, and "topic pairs", in Claims 10, 12, and 16)" was implied by the term "a different plurality of pairs" (p. 14, line 10) and the parenthetical "(i.e., "string pairs", in Claim 1, and "text pairs", in Claims 10, 12, and 16)" was implied by the term "yet another plurality of pairs" (p. 14, lines 10 - 11) of the previously-submitted response.

IV.   Conclusion

Applicant respectfully requests reconsideration of the pending rejected claims, withdrawal of all presently outstanding rejections, and allowance of all remaining claims at an early date.

Respectfully submitted,

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